

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 2, 2021

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The undersigned non-Kreindler members of the Plaintiffs' Executive Committees ("non-Kreindler PECs") write in response to the Court's order earlier this evening at ECF No. 7402, granting the government's extension requests at ECF Nos. 7390 and 7391. The PECs respectfully request that the Court also extend the deadline for the plaintiff's and the PECs' letters in response to the Court's Order at ECF No. 7354 to January 28, 2022.

In the Court's Nov. 15, 2021 Order, ECF No. 7354, the Court directed the *Faulkner* plaintiffs and the PECs to file a letter tied to the Court's Dec. 10, 2021 deadline for the government to file its Statement of Interest. The undersigned believe the extension granted to the government will afford an opportunity for the PECs to engage with the government on the issues the court raised. To facilitate that dialogue, we request that the Court also grant a corresponding extension, to January 28, 2022, for the plaintiff's and the PECs' letters in response to the Court's Order at ECF No. 7354.

We thank the Court in advance for its attention.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter
SEAN P. CARTER
SCOTT TARBUTTON
COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Robert T. Haefele
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Honorable Sarah Netburn
December 2, 2021
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cc: The Honorable George B. Daniels (via ECF)
All counsel of record via ECF